

*Valencia v. Live Lion Security LLC*  
No. 21 Civ. 448 (PK)

**EXHIBIT 3**

**Contemporaneous Billing Records of  
Pechman Law Group PLLC**

Affirmation of Louis Pechman in Support of  
Motion for Final Settlement Approval

**PECHMAN LAW GROUP PLLC**  
**A T T O R N E Y S   A T   L A W**

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**INVOICE**

Invoice # 254  
Date: 08/05/2022

Ramon Arquindes Valencia

**Live Lion Security**

**Services**

Attorney	Date	Notes	Quantity	Rate	Total
MA	12/23/2020	Consult with Ramon A. Valencia from Live Lion Security.	1.10	\$225.00	\$247.50
GC	12/23/2020	Review notes from consult by Albert and continue consult with her and Valencia.	0.60	\$500.00	\$300.00
GC	12/24/2020	Discuss facts of case and potential class action with Pechman, including how to proceed with it and where to file it (EDNY as opposed to	0.20	\$500.00	\$100.00

		state court).			
LP	12/24/2020	Discussion with Cuadra about case facts and filing in EDNY.	0.20	\$600.00	\$120.00
GC	01/13/2021	Review facts of case in connection with initial drafting of class and collective action complaint.	0.40	\$500.00	\$200.00
MA	01/14/2021	Review, analyze, and take notes on all hourly reports received from client (over 220 pages) in preparation for drafting complaint with examples of legal violations with references to specific workweeks.	3.70	\$225.00	\$832.50
GC	01/14/2021	Call with Valencia to review information in documents provided and information about other employees at Live Lion, including individuals who could opt-in to the action.	0.40	\$500.00	\$200.00
MA	01/15/2021	Continue drafting Class Action Complaint based on information from consult and additional information received from client.	2.80	\$225.00	\$630.00
MA	01/19/2021	Finalize first complete draft of the Live Lion Class Action Complaint, including review of main facts asserted in it, with client.	2.70	\$225.00	\$607.50
GC	01/22/2021	Review and revise class action complaint to include	1.40	\$500.00	\$700.00

		specific information from documents received from client (e.g., specific examples of workweeks with amounts owed) and spread-of-hours claim based on documents from client, information from client's intake, and information from Albert's notes on documents received.			
LP	01/22/2021	Review and comment on Complaint.	0.60	\$600.00	\$360.00
GC	01/22/2021	Discuss main facts of case, claims, legal theories, and potential size of class with Pechman.	0.30	\$500.00	\$150.00
LP	01/22/2021	Discussion of facts, potential liability, and claims with Cuadra in preparation for review of complaint.	0.30	\$600.00	\$180.00
GC	01/26/2021	Review and comment on civil cover sheet and Spanish/English consent to sue form, then send comments back to Albert to edit documents.	0.20	\$500.00	\$100.00
GC	01/26/2021	Review, revise, and put Complaint in final for filing.	0.40	\$500.00	\$200.00
MA	01/27/2021	File Complaint, Coversheet, and Summonses on EDNY ECF.	0.40	\$225.00	\$90.00
MA	01/28/2021	Telephone call with Valencia about the filing of the complaint and the	0.20	\$225.00	\$45.00

		required "consent to be Party Plaintiff" form, including what the form is, why it is required, and how other employees can sign it to join the case.			
GC	02/04/2021	Email defendants re: complaint enclosed, should speak to their attorneys and have them speak with us.	0.10	\$500.00	\$50.00
GC	02/11/2021	Initial call with Jennifer Kim of Book & Moskowitz, defense counsel, re: they were retained and waiver of service.	0.20	\$500.00	\$100.00
GC	02/16/2021	Call with Norvelis Serrano re: intake consult, pay at Live Lion, hours worked, periods of employment, work performed by others (and their hours worked and pay received), documents in her possession, description of what case is about (including explanation of why she was paid incorrectly and can join the lawsuit), and her rights by joining the lawsuit.	0.90	\$500.00	\$450.00
GC	02/16/2021	Draft waiver of service and send it to defense counsel.	0.20	\$500.00	\$100.00
GC	02/17/2021	Discuss Norvelis's facts stated, as well as information received from her, with Pechman and explain how it makes case stronger (including additional	0.30	\$500.00	\$150.00

		information about other employees, how frequently employees worked overtime, and general pay practices at Live Lion).			
LP	02/17/2021	Discussion with Cuadra about additional facts obtained from opt-in plaintiff's intake consult.	0.30	\$600.00	\$180.00
GC	02/18/2021	Call with Kim, defense counsel, re: potential settlement discussions, class-wide settlement, allegations in complaint and case, information proving case, and future call with Pechman and Chaim to discuss in more detail.	0.20	\$500.00	\$100.00
GC	03/02/2021	Call with Valencia re: status of case, appearance of defendants, who defense counsel is, people who have called firm and may join case, and reaching out to other employees who can join case.	0.20	\$500.00	\$100.00
GC	03/15/2021	Call with Serrano re: opt-in form and information in case needed for class action certification later on.	0.20	\$500.00	\$100.00
GC	04/26/2021	Discuss Defendants' admissions with Pechman.	0.20	\$500.00	\$100.00
LP	04/26/2021	Discussion with Cuadra about Defendants' admissions in Answer.	0.20	\$600.00	\$120.00

GC	06/01/2021	Email defense counsel re: should have Rule 26 conference even if it is not required by the Court, so that parties can discuss discovery and potential resolution.	0.10	\$500.00	\$50.00
GC	06/02/2021	Discussion with Pechman and defense counsel, Christopher Neff, re: discovery in case (including documents in plaintiffs' possession and what they show, as well as documents in defendants' possession and what Defendants say they show), potential motion for class action certification, requesting a mediation, and proceeding to mediation on a class basis to preserve resources.	0.40	\$500.00	\$200.00
LP	06/02/2021	Telephone conference with defense counsel re: settlement possibilities and discovery.	0.40	\$600.00	\$240.00
GC	06/11/2021	Discuss drafting of document requests, interrogatories, and initial disclosures with Albert.	0.20	\$500.00	\$100.00
MA	06/11/2021	Call with Valencia to discuss initial disclosures and obtain information about additional individuals with discoverable information.	0.30	\$225.00	\$67.50
MA	06/11/2021	Draft Plaintiff's Rule 26 initial disclosures and send	0.80	\$225.00	\$180.00

		to Cuadra for review.			
MA	06/11/2021	Discuss drafting of document requests, interrogatories, and initial disclosures with Cuadra.	0.20	\$225.00	\$45.00
GC	06/14/2021	Review Court's discovery order in connection with explaining to Albert what it is that has to be produced to defense counsel, the statement that must be written to defense counsel, and what the parties will have to request to amend in the Court's order to proceed with mediation on a class-wide basis.	0.30	\$500.00	\$150.00
MA	06/14/2021	Draft letter to Judge Kuo regarding ECF. No. 5 and send to Cuadra for review.	0.70	\$225.00	\$157.50
GC	06/14/2021	Email defense counsel re: class-wide discovery agreed to, need to comply with Court's discovery order, and need to inform Court of parties' plan to proceed to mediation on a class-wide basis.	0.20	\$500.00	\$100.00
MA	06/14/2021	Draft letter to defense counsel regarding initial discovery, sent to Cuadra for review.	1.50	\$225.00	\$337.50
GC	06/14/2021	Review and revise joint letter to court re: mediation will proceed on a class-wide basis and so the parties	0.30	\$500.00	\$150.00



		request to adjourn it.			
MA	06/14/2021	Review documents received from clients, redact and prepare for production to go along with letter to Defendants.	0.60	\$225.00	\$135.00
GC	06/14/2021	Review and revise letter to defense counsel required by ECF No. 5.	0.90	\$500.00	\$450.00
LP	06/14/2021	Review letter to defense counsel re: damages.	0.20	\$600.00	\$120.00
GC	06/15/2021	Call with defense counsel re: edits to joint letter to Court.	0.20	\$500.00	\$100.00
GC	06/15/2021	Revise letter to court following call with defense counsel.	0.20	\$500.00	\$100.00
GC	06/15/2021	Revise letter to defense counsel re: initial production and other information required in ECF No. 5.	0.10	\$500.00	\$50.00
GC	06/16/2021	Finalize and file joint letter-motion to court following receipt of final edits and confirmation from defense counsel.	0.10	\$500.00	\$50.00
GC	06/16/2021	Finalize and submit to defense counsel plaintiffs' first production and letter required by ECF No. 5.	0.10	\$500.00	\$50.00
GC	06/16/2021	Discussion with Pechman about mediators defendants proposed.	0.10	\$500.00	\$50.00
LP	06/16/2021	Discussion with Cuadra re:	0.10	\$600.00	\$60.00

		mediators proposed by defendants.			
GC	06/22/2021	Email defense counsel re: production of payroll records for class.	0.10	\$500.00	\$50.00
GC	06/23/2021	Initial review of defendants' production in connection with emailing defense counsel re: missing information for half the proposed class period.	0.30	\$500.00	\$150.00
GC	06/28/2021	Draft damages spreadsheet, with all formulas for calculations, and complete damages for named plaintiff Valencia.	1.80	\$500.00	\$900.00
GC	07/08/2021	Review payroll and time worked data received from defendants for the class in connection with working ways to convert it to Excel format to expedite analysis and use of data for damages calculations.	0.60	\$500.00	\$300.00
GC	07/27/2021	Call with Valencia re: status of case, information in documents received to date, information in his own documents and how they compare to defendants' production, how damages are calculated, what happens next in case, review of information in Defendants' records, and potential date for mediation.	0.50	\$500.00	\$250.00

GC	07/27/2021	Call with Serrano to discuss the information in Defendants' documents produced (including their accuracy), how they compare to Serrano's own documents, and the dates Live Lion existed.	0.30	\$500.00	\$150.00
GC	07/28/2021	Explain damages calculations to Albert, so that she can do the calculations for the class.	0.40	\$500.00	\$200.00
MA	07/28/2021	Zoom call with Cuadra to review documents produced by Defendants in order to draft damages.	0.40	\$225.00	\$90.00
MA	07/28/2021	Begin class damage calculations based on payroll records produced by defendants.	1.20	\$225.00	\$270.00
MA	07/29/2021	Continue extracting data from documents produced by defendants to calculate damages.	3.50	\$225.00	\$787.50
MA	07/30/2021	Continue extracting hours worked and pay rate from records produced by defendants to calculate damages.	3.90	\$225.00	\$877.50
MA	08/02/2021	Continue working on damage calculations based on records produced by defendants.	5.70	\$225.00	\$1,282.50
MA	08/03/2021	Continue working on damage calculations,	2.80	\$225.00	\$630.00

		specifically inputting spread-of-hours shifts worked, and days worked per week.			
MA	08/04/2021	Continue inputting damages, specifically inputting spread-of-hours shifts and days worked.	2.90	\$225.00	\$652.50
MA	08/05/2021	Continue inputting spread-of-hours shifts and days worked for damage calculations.	3.30	\$225.00	\$742.50
MA	08/06/2021	Continue inputting the spread of hours shifts and days worked for damage calculations.	4.60	\$225.00	\$1,035.00
MA	08/11/2021	Finish damages, including total plaintiff's spreadsheet and spread-of-hours, and days worked.	3.70	\$225.00	\$832.50
GC	08/11/2021	Initial review of damages calculations.	0.30	\$500.00	\$150.00
GC	08/19/2021	Begin review and revision of damages calculations for class.	1.20	\$500.00	\$600.00
GC	08/19/2021	Continue damages calculations.	1.40	\$500.00	\$700.00
GC	08/20/2021	Continue damages calculations.	0.90	\$500.00	\$450.00
GC	08/20/2021	Continue revision of damages calculations.	1.50	\$500.00	\$750.00
MA	08/23/2021	Zoom with Cuadra to discuss edits that need to be made on damages	0.30	\$225.00	\$67.50

		spreadsheet.			
GC	08/23/2021	Continued review of damages calculations spreadsheet.	0.40	\$500.00	\$200.00
GC	08/23/2021	Review damages calculations with Albert, including necessary revisions, information that must be added to them from documents defendants produced, and formulas to be updated.	0.30	\$500.00	\$150.00
MA	08/23/2021	Revise damages spreadsheet per Cuadra's instructions, including correcting sheet names on summary page, correcting and updating number of days worked and WTPA damages, and fixing circulate formulas in calculations.	2.80	\$225.00	\$630.00
GC	08/23/2021	Review, revise, and finalize damages calculations.	0.30	\$500.00	\$150.00
MA	08/24/2021	Draft explanatory email for class damages and update spreadsheet, email to Cuadra for final review.	2.70	\$225.00	\$607.50
GC	08/25/2021	Finalize and send damages calculations with explanatory email to defense counsel.	1.20	\$500.00	\$600.00
GC	08/30/2021	Email defense counsel re: status update due to court tomorrow, need to ask for a mediation and proposed	0.10	\$500.00	\$50.00

		dates.			
GC	08/30/2021	Draft and send status report to defense counsel for review.	0.30	\$500.00	\$150.00
GC	08/30/2021	Finalize and file joint status report.	0.20	\$500.00	\$100.00
GC	08/31/2021	Begin review of potential mediators for October mediation.	0.10	\$500.00	\$50.00
GC	08/31/2021	Research potential mediators.	0.30	\$500.00	\$150.00
GC	09/01/2021	Email mediators re: potentially serving as mediators for parties.	0.20	\$500.00	\$100.00
MA	09/14/2021	Attempt to call client to inform him of mediation date, sent message on WA with details.	0.20	\$225.00	\$45.00
GC	09/24/2021	Begin review of facts of case and documents received from defendants in preparation for call with mediator and defense counsel at 3 p.m.	0.30	\$500.00	\$150.00
GC	09/24/2021	Call with defense counsel, Pechman, and Goldstein (mediator) to discuss facts of case, damages so far, discussions about settlement, disputes, and upcoming mediation logistics.	0.30	\$500.00	\$150.00
LP	09/24/2021	Zoom call with Cuadra, mediator, and defense	0.30	\$600.00	\$180.00

		counsel to discuss facts of case, damages so far, settlement strategy, parties' disputes, and how parties can proceed to mediation.			
GC	09/28/2021	Review EDNY mediation materials, including contract received from mediator, and send back signed agreement to mediator.	0.40	\$500.00	\$200.00
GC	10/04/2021	Begin drafting mediation position statement.	1.10	\$500.00	\$550.00
GC	10/04/2021	Finalize first full draft of settlement position statement.	0.90	\$500.00	\$450.00
GC	10/04/2021	Call with Valencia to review and confirm facts in position statement.	0.20	\$500.00	\$100.00
GC	10/04/2021	Call with Serrano to confirm facts in position statement.	0.10	\$500.00	\$50.00
LP	10/05/2021	Review and revise mediation position statement.	0.80	\$600.00	\$480.00
GC	10/05/2021	Finalize and submit mediation position statement to Goldstein, mediator.	0.50	\$500.00	\$250.00
MA	10/18/2021	Call with Valencia to confirm attendance at mediation.	0.10	\$225.00	\$22.50
MA	10/18/2021	Attempted call to Serrano to confirm attendance at mediation, send WA message re same.	0.10	\$225.00	\$22.50
LP	10/18/2021	Discussion with Cuadra	0.60	\$600.00	\$360.00

re:strategy for mediation.					
GC	10/18/2021	Discussion with Pechman re: mediation strategy, including damages in case, how they were calculated, facts of case (including those in dispute and those admitted), potential settlement amounts for class, and how to negotiate most effectively with Goldstein and defense counsel.	0.60	\$500.00	\$300.00
GC	10/19/2021	Review facts of case, production, and damages calculations in preparation for mediation.	0.30	\$500.00	\$150.00
GC	10/19/2021	Discuss and re-confirm facts of case, damages, and discovery with both clients.	0.20	\$500.00	\$100.00
GC	10/19/2021	Attend and participate in mediation with clients and Albert and Pechman (Pechman present for part of time), in which case was ultimately resolved in principle.	7.60	\$500.00	\$3,800.00
GC	10/19/2021	Draft settlement term sheet based on agreement in principle reached at mediation.	0.90	\$500.00	\$450.00
MA	10/19/2021	Attend and take notes in mediation with clients and Cuadra and Pechman (Pechman present for part of time), in which case was ultimately resolved in	7.60	\$225.00	\$1,710.00



		principle.			
LP	10/19/2021	Attend portions of mediation.	4.70	\$600.00	\$2,820.00
LP	10/20/2021	Review and revise term sheet.	1.20	\$600.00	\$720.00
GC	10/22/2021	Finalize first complete draft of settlement term sheet and send it to defense counsel.	0.70	\$500.00	\$350.00
GC	10/26/2021	Review and revise term sheet and send it back with explanation of changes to defense counsel.	0.30	\$500.00	\$150.00
GC	10/27/2021	Review and revise settlement term sheet and send it back to defense counsel for further review.	0.20	\$500.00	\$100.00
GC	10/27/2021	Finalize and send executed term sheet back to defense counsel.	0.10	\$500.00	\$50.00
LP	10/28/2021	Review email from mediator Goldstein re: status.	0.10	\$600.00	\$60.00
GC	11/09/2021	Review and comment on draft status update to court.	0.10	\$500.00	\$50.00
GC	11/10/2021	Email defense counsel re: telling court this is a class action settlement, not an individual settlement under Cheeks, and that we need more time for all settlement papers to be submitted as part of the settlement terms.	0.10	\$500.00	\$50.00
GC	11/12/2021	Draft joint letter-motion to Judge Kuo re: scheduling of	0.40	\$500.00	\$200.00

		payments in settlement, settlement terms, and Order does not account for fact that this is a class action settlement.			
GC	11/12/2021	Review and revise letter-motion to court re: settlement, schedule for submitting motions, and reference order.	0.20	\$500.00	\$100.00
GC	12/29/2021	Discuss distributions of settlement amount with Pechman in preparation for revision of settlement agreement.	0.20	\$500.00	\$100.00
GC	12/29/2021	Review and revise all settlement agreement documents (draft agreement, all exhibits, and settlement shares chart).	8.20	\$500.00	\$4,100.00
LP	12/29/2021	Discussion with Cuadra re: settlement distribution.	0.20	\$600.00	\$120.00
MA	12/30/2021	Final proofreading of class settlement agreement and exhibits.	0.80	\$225.00	\$180.00
GC	01/04/2022	Review and revise settlement agreement and all of its exhibits and send them to defense counsel.	2.20	\$500.00	\$1,100.00
GC	01/18/2022	Email defense counsel re: status of revisions to settlement agreement and production of class list.	0.10	\$500.00	\$50.00
GC	01/18/2022	Review revisions to	0.40	\$500.00	\$200.00

		settlement agreement received from defense counsel.			
GC	01/18/2022	Finalize and send settlement agreement to defense counsel.	0.20	\$500.00	\$100.00
GC	01/19/2022	Discuss settlement structure and preliminary approval motion with Pechman.	0.10	\$500.00	\$50.00
GC	01/19/2022	Email defense counsel re: payment terms in agreement are still acceptable and suggestion for new term, if defendants are willing to accept it.	0.10	\$500.00	\$50.00
LP	01/19/2022	Discussion with Cuadra re: settlement structure.	0.10	\$600.00	\$60.00
MA	01/21/2022	Call with Valencia and Serrano regarding scheduling zoom to review and sign settlement agreement.	0.10	\$225.00	\$22.50
GC	01/24/2022	Begin drafting motion for preliminary settlement approval.	0.30	\$500.00	\$150.00
GC	01/24/2022	Draft letter to Judge Matsumoto re: referral of matter to Judge Kuo and send it to defense counsel for review.	0.10	\$500.00	\$50.00
GC	01/24/2022	Continue drafting preliminary settlement approval motion.	1.70	\$500.00	\$850.00

MA	01/27/2022	Review entire settlement agreement, including exhibits, in Spanish with Valencia and Serrano.	1.30	\$225.00	\$292.50
MA	01/27/2022	Send settlement agreement to Valencia and Serrano for signature.	0.10	\$225.00	\$22.50
GC	01/27/2022	Finalize and file joint letter motion requesting referral to magistrate judge.	0.10	\$500.00	\$50.00
GC	01/27/2022	Finalize and submit signed settlement agreement to defense counsel.	0.10	\$500.00	\$50.00
GC	01/31/2022	Continue drafting preliminary settlement approval motion.	1.30	\$500.00	\$650.00
GC	01/31/2022	Continue drafting motion for preliminary settlement approval.	1.10	\$500.00	\$550.00
GC	01/31/2022	Continue drafting motion for preliminary settlement approval.	1.90	\$500.00	\$950.00
GC	01/31/2022	Continue drafting motion for preliminary settlement approval.	0.30	\$500.00	\$150.00
GC	01/31/2022	Continue drafting motion for class action settlement approval.	0.40	\$500.00	\$200.00
GC	01/31/2022	Continue drafting motion for preliminary settlement approval.	0.30	\$500.00	\$150.00
GC	01/31/2022	Continue drafting motion for preliminary settlement	0.80	\$500.00	\$400.00

		approval.			
GC	02/01/2022	Continue review and revision of motion for preliminary settlement approval.	0.70	\$500.00	\$350.00
GC	02/01/2022	Emails with Rust Consulting Inc, potential claims administrator, re: quote for work and work to be done.	0.10	\$500.00	\$50.00
GC	02/01/2022	Continue drafting motion for preliminary settlement approval.	0.80	\$500.00	\$400.00
GC	02/01/2022	Finalize fist full draft of motion for preliminary approval papers.	4.20	\$500.00	\$2,100.00
GC	02/03/2022	Email defense counsel re: motion for preliminary approval and Rust Consulting's estimated fee.	0.10	\$500.00	\$50.00
GC	02/04/2022	Continue review and revision of motion for preliminary settlement approval.	0.70	\$500.00	\$350.00
GC	02/04/2022	Review and revise motion for preliminary approval.	0.60	\$500.00	\$300.00
GC	02/04/2022	Finalize motion for preliminary settlement approval and file.	1.30	\$500.00	\$650.00
LP	02/04/2022	Review preliminary approval motion papers.	0.60	\$600.00	\$360.00
GC	02/22/2022	Review motion for preliminary settlement approval in preparation for	0.10	\$500.00	\$50.00

		conference call with Judge Kuo and defense counsel.			
GC	02/22/2022	Preliminary approval conference call with defense counsel, Albert, and Judge Kuo, at which Judge Kuo said she would preliminarily approve the settlement.	0.40	\$500.00	\$200.00
MA	02/22/2022	Attend court conference regarding the preliminary approval of class/collective with Cuadra.	0.40	\$225.00	\$90.00
GC	02/22/2022	Email defense counsel timeline of all upcoming events under the settlement, from preliminary settlement approval through mailing of settlement checks.	0.20	\$500.00	\$100.00
MA	02/22/2022	File notice of appearance.	0.10	\$225.00	\$22.50
GC	02/22/2022	Review email from Rust Consulting with upcoming due dates.	0.10	\$500.00	\$50.00
GC	02/23/2022	Email Claims Administrator, Rust Consulting, re: court preliminarily approved settlement and upcoming due dates under settlement agreement.	0.10	\$500.00	\$50.00
GC	02/23/2022	Draft Excel chart summarizing all major events to take place under settlement, then share it with both defense counsel and Rust Consulting.	0.70	\$500.00	\$350.00

GC	02/25/2022	Emails with defense counsel and claims administrator re: upcoming deadlines, translation of notices, and information about settlement shares to be provided.	0.20	\$500.00	\$100.00
GC	02/25/2022	Email Rust Consulting, with defense counsel cc'd, re: why information Counsel for Defendants provided cannot be completely used (i.e., not all individuals listed are class members under the settlement because they did not all sustain damages), calculation of settlement shares, information to be included in class notices, who is a class member in class counsel's damages calculations, and how to use the calculations for settlement administration purposes.	0.20	\$500.00	\$100.00
GC	02/28/2022	Email with defense counsel and Rust Consulting re: correct amount of settlement fund, recalculation of it, and provision of data to Rust Consulting for settlement administration duties.	0.10	\$500.00	\$50.00
GC	03/01/2022	Review all contact information, emails, socials, addresses, and estimated settlement shares in master chart, and confirm the information is correct, to send to Defense Counsel for final review before sending	1.10	\$500.00	\$550.00

		to Rust Consulting.			
GC	03/01/2022	Final review of data for Rust Consulting, then send it to Rust Consulting.	0.10	\$500.00	\$50.00
GC	03/02/2022	Email Rust Consulting re: updated information for estimated settlement shares, including formula updates for their calculation.	0.10	\$500.00	\$50.00
GC	03/02/2022	Correct damages and estimated settlement shares spreadsheet received from Rust Consulting and email corrected version back to Rust with explanation of all changes and new formulas used and why they are required under settlement agreement.	0.60	\$500.00	\$300.00
GC	03/03/2022	Review Rust's email about settlement share formulas in connection with revision of formulas used to get exact amounts, down to 8 decimal places, for all Class Members' settlement shares to avoid having amounts over the settlement payment amount, in connection with sending revised calculations to Rust Consulting.	0.60	\$500.00	\$300.00
GC	03/10/2022	Begin review and translation of Live Lion settlement notice.	2.10	\$500.00	\$1,050.00
GC	03/10/2022	Finalize translation and revision of class notice and	0.50	\$500.00	\$250.00



		send it to Albert for final review.			
MA	03/11/2022	Review and edit the Class Notice and Spanish version, send edits back to Cuadra.	1.00	\$225.00	\$225.00
GC	03/11/2022	Email defense counsel re: Spanish notice translation, how it was translated, and defendants can review it at their own expense with a Spanish vendor if they want to.	0.10	\$500.00	\$50.00
GC	03/14/2022	Emails with Rust Consulting and defense counsel re: translation of notices and provision of them to Rust Consulting.	0.10	\$500.00	\$50.00
GC	03/15/2022	Finalize and send class notices to Rust Consulting.	0.10	\$500.00	\$50.00
GC	03/22/2022	Review four sample final class action notices to be mailed to class members and confirm by email to Rust Consulting that they can be mailed on 3/24/22.	0.20	\$500.00	\$100.00
GC	03/23/2022	Email Rust Consulting and defense counsel re: reminder of payment obligations (i.e., deposits) starting on April 1 and Rust has to set up bank account (i.e., the QSF under the settlement agreement).	0.10	\$500.00	\$50.00
GC	03/28/2022	Review upcoming deadlines under settlement agreement and compare them to dates	0.10	\$500.00	\$50.00

		received from Rust Consulting.			
MA	04/01/2022	Call with Valencia and Cuadra re settlement distribution and class representative reward.	0.40	\$225.00	\$90.00
MA	04/01/2022	Email correspondence with Rust Consulting re Valencia's address for notice.	0.10	\$225.00	\$22.50
GC	04/01/2022	Call with Valencia and Albert to explain settlement distribution and class representative awards, how this works under the settlement, how much Valencia will receive, and how the payments will be made.	0.40	\$500.00	\$200.00
GC	04/13/2022	Review updates received from Rust Consulting re: status of class so far.	0.10	\$500.00	\$50.00
GC	04/19/2022	Review Rust's report to date.	0.10	\$500.00	\$50.00
GC	05/03/2022	Review latest updates from Rust Consulting.	0.10	\$500.00	\$50.00
GC	05/10/2022	Review administration update from Rust Consulting.	0.10	\$500.00	\$50.00
GC	05/18/2022	Review update from settlement administrator.	0.10	\$500.00	\$50.00
GC	06/21/2022	Email Rust Consulting re: when payment would be due if the Court approved the	0.10	\$500.00	\$50.00

settlement on August 16, 2022.					
GC	07/05/2022	Review latest status update from Rust Consulting.	0.20	\$500.00	\$100.00
GC	07/05/2022	Begin drafting motion for final settlement approval.	0.30	\$500.00	\$150.00
GC	07/05/2022	Initial review of Rust Consulting's affidavit in support of final approval motion.	0.10	\$500.00	\$50.00
GC	07/19/2022	Review latest update from Rust Consulting concerning notices sent, how many people did not receive one, and objections/opt-outs (none to date).	0.20	\$500.00	\$100.00
GC	07/20/2022	Continue drafting motion for final settlement approval.	0.20	\$500.00	\$100.00
GC	07/21/2022	Continue drafting motion for final settlement approval.	0.20	\$500.00	\$100.00
GC	07/22/2022	Continue drafting motion for final settlement approval.	0.40	\$500.00	\$200.00
GC	07/22/2022	Continue draft motion for final settlement approval.	1.50	\$500.00	\$750.00
GC	07/25/2022	Continue drafting motion for final settlement approval.	1.50	\$500.00	\$750.00
GC	07/25/2022	Email defense counsel re: status of motion for final settlement approval and remaining payment due dates, including whether defendants can pay the amounts faster.	0.10	\$500.00	\$50.00

GC	07/25/2022	Continue drafting motion for final settlement approval.	0.70	\$500.00	\$350.00
GC	07/25/2022	Continue drafting motion for final settlement approval.	3.70	\$500.00	\$1,850.00
GC	07/25/2022	Continue drafting settlement approval motion.	1.20	\$500.00	\$600.00
GC	07/26/2022	Finalize first complete draft of all final settlement approval motion papers.	5.70	\$500.00	\$2,850.00
LP	07/26/2022	Review motion for final approval.	0.50	\$600.00	\$300.00
LP	07/27/2022	Review/edit memoranda of law and declaration in support of final approval of class settlement.	2.30	\$600.00	\$1,380.00
GC	08/01/2022	Final review of Rust Consulting's affidavit in support of final settlement approval motion.	0.10	\$500.00	\$50.00
GC	08/01/2022	Review and revise Pechman Declaration and Memorandum of Law in support of motion for final settlement approval.	0.80	\$500.00	\$400.00
GC	08/02/2022	Review all time entries in connection with revision of draft motion for final settlement approval.	1.70	\$500.00	\$850.00
GC	08/02/2022	Finalize motion for final settlement approval papers and send them to defense counsel for review.	1.30	\$500.00	\$650.00

**Expenses**

<b>Type</b>	<b>Date</b>	<b>Notes</b>	<b>Quantity</b>	<b>Rate</b>	<b>Total</b>
Expense	06/14/2021	Filing Fee	1.00	\$402.00	\$402.00
Expense	11/02/2021	Mediation fees paid to Phil Goldstein, mediator (two invoices, first for \$300 and second for \$437.50).	1.00	\$737.50	\$737.50
				<b>Total</b>	<b>\$71,507.00</b>

**Detailed Statement of Account****Current Invoice**

<b>Invoice Number</b>	<b>Due On</b>	<b>Amount Due</b>	<b>Payments Received</b>	<b>Balance Due</b>
254	08/05/2022	\$71,507.00	\$0.00	\$71,507.00
<b>Outstanding Balance</b>				<b>\$71,507.00</b>
<b>Amount in Trust</b>				<b>\$0.00</b>
<b>Total Amount Outstanding</b>				<b>\$71,507.00</b>